

## SUPPORTING STATEMENT

### FOR

## INFORMATION COLLECTION REQUEST

### STRATOSPHERIC OZONE PROTECTION, SERVICING OF MOTOR VEHICLE AIR CONDITIONERS

#### A. JUSTIFICATION

##### 1. Identification of Information Collection

a) Title: "Servicing of Motor Vehicle Air Conditioners"

OMB Control Number: 2060-0247

EPA Number: 1617.04

b) Short Characterization/Abstract

History. In 1992, EPA developed regulations under section 609 of the Clean Air Act Amendments of 1990 (Act) for the recycling of chlorofluorocarbons in motor vehicle air conditioners. These regulations were published in 57 FR 31240, and are codified at 40 CFR Subpart B (§ 82.30 et seq.). The information required to be collected under the Section 609 regulations is described below. This information is currently approved for use through May 31, 2002. This supporting statement is submitted to justify an extension of the approval of use of this information. Pursuant to new requirements under the Paperwork Reduction Act, a notice was published in the Federal Register on December 20, 2001, announcing the intent to extend the renewal of this Information Collection Request and requesting comment on the renewal. Descriptions of the type of recordkeeping and reporting requirements mandated by section 609 are summarized below in this section. The chart located at the end of this document displays the cost of each of these requirements.

Technician training and certification. According to Section 609(b)(4) of the Act, automotive technicians are required to be certified in the proper use of recycling equipment for servicing motor vehicle air conditioners. Certification programs must meet EPA standards. The Global Programs Division (GPD) requires that certification programs send full sets of their training materials to EPA for approval. The information requested is used by the GPD to guarantee a degree of uniformity in the testing programs for motor vehicle service technicians. The technician certification program must provide the GPD with a copy of their testing program, including test procedures for grading, the score required to pass, and any training tools or visual aides provided. Due to rapid developments in technology, the Agency requires that each approved technician certification program will review and update their program every two years. A summary of the review report is required to be submitted to EPA. After the test has

been approved by EPA, a hard copy remains on file in the GPD. Currently, about 25 testing programs have been approved by EPA to train technicians in the proper use of recycling equipment.

Approved independent standards testing organizations. In addition, Section 609(b)(2)(A) of the Act requires independent laboratory testing of recycling equipment to be certified by EPA. The GPD requires independent laboratories to submit an application that proves their general capacity to certify equipment to meet the Society of Automotive Engineers (SAE) J standards for recycled refrigerant. The information requested is used by the GPD to approve independent laboratories that can assure an industry accepted standard of quality in recycling and recovery equipment. An independent laboratory that is interested in testing recycling and recovery equipment must submit an application to the GPD that includes a list of testing procedures and equipment that will be used in testing. Once an independent laboratory has been approved by EPA, the application is kept on file in the GPD. Two laboratories, Underwriters Laboratories Inc. and ETL Testing Laboratories, are currently approved to test recycling equipment. Note that EPA does not anticipate that any organizations will apply to EPA in the future to become approved independent standards testing organizations. Therefore, annual hours and costs related to information submitted by these organizations have been eliminated.

Substantially identical equipment. Finally, Section 609(b)(2)(B) of the Act allows equipment that was purchased before the proposal of the regulations to be approved by EPA if it is substantially identical to equipment that has been certified by an EPA approved independent laboratory. This measure is designed to incorporate or "grandfather" older equipment that has not been submitted to an independent laboratory for testing. The equipment manufacturer or owners may submit the following to the GPD: an application and supporting documents that includes process flow sheets, a list of equipment components and any other information which would indicate that the equipment is capable of cleaning the refrigerant to standards set forth in Appendix A to the regulations or recovering refrigerant to standards set forth in Appendix B to the regulations. The information provided allows EPA to determine if the equipment is substantially identical to certified equipment and is kept on file at the GPD.

Certification, reporting and recordkeeping. To facilitate enforcement under Section 609, EPA has developed several recordkeeping requirements.

First, Section 609(d)(3)-(4) of the Act requires that by January 1, 1992, all entities that service motor vehicle air conditioners for consideration must have acquired approved refrigerant recycling equipment. The establishment must have submitted to the Administrator on a one-time basis a certificate that provides the following information: the name of the equipment owner, the address of the service establishment where the equipment will be used, and the make, model, year, and serial number of the equipment. The certification should have been submitted on or before January 1, 1993. The information is used by the GPD to verify compliance with Section 609 of the Act.

Second, establishments that own recover-only equipment must maintain records of the name and address of the facility that is reclaiming their refrigerant.

Third, any person who owns approved refrigerant recovery or recycling equipment must retain records demonstrating that all persons authorized to operate the equipment are currently certified technicians.

Fourth, any person who sells or distributes refrigerant that is in a container of less than 20 pounds must verify that the purchaser is a certified technician, unless the purchase of small containers is for resale only. In that case, the seller must obtain a written statement from the purchaser that the containers are for resale only, and must indicate the purchaser's name and business address. In the case of certified technicians purchasing small containers of refrigerant for servicing motor vehicles, the submission of a written statement is not required and there are no recordkeeping requirements. Technicians must be prepared to show proof of technician certification when purchasing small containers. These records must be kept by the establishment for a period of up to three years.

## **2. Need for and Use of the Collection**

### **a) Authority for the Collection**

The information requested for all entities that service motor vehicle air conditioning is required by Section 609(d) of the Act. Proposed automotive technician certification programs are required to be approved by EPA in Section 609(b)(4). Section 609(b)(2)(A) requires the approval of independent laboratories by EPA. The submission of data for EPA determination of substantially identical equipment is addressed by Section 609(b)(2)(B). The recordkeeping requirements for the motor vehicle recycling program are derived from Section 114 of the Act.

### **b) Practical Utility/Users of the Data**

Motor vehicle air conditioning service establishments are required by Section 609 of the Act to certify that they have purchased recycling and recovery equipment by January 1, 1992. The GPD uses the certificates to confirm compliance with Section 609.

In order for technicians to use recycling and recovery equipment, they must pass a certification test as stipulated in Section 609. In order to reduce ozone depletion the Agency has therefore established minimum, national standards for technician certification of the Clean Air Act. The GCD uses the information submitted by technician certification programs to determine if the programs meet the standards established by the Agency. In addition, the GCD uses certification program information to ensure that Agency standards are at least as stringent as the SAE J standards of the Society of Automotive Engineers, or the current national standard.

Because of the rapidly changing nature of the motor vehicle air conditioning market, EPA requires that technician certification programs conduct internal reviews and update their program every two years. By requiring a summary of the review to be reported to EPA, the Agency can assure the accuracy of the information and maintain parity among testing programs.

The Agency is required to either test refrigerant recycling equipment itself or approve independent laboratories to test equipment. In order to protect the purity of the pool of recycled refrigerant for use in the motor vehicles, the Agency is required to guarantee that all recycling and recovery equipment meets minimum national standards. Since EPA does not have the capabilities to test recycling or recovery equipment on a national scale, the Agency relies on private laboratories to test equipment. Currently, Underwriters Laboratories (UL) and ETL Testing Laboratories (ETL) certify equipment on a voluntary basis. The Agency established a program to evaluate and approve UL and ETL procedures in addition to other laboratories that may request approval. The Stratospheric Protection Division uses the information provided by independent laboratories to evaluate their capability to test recycling and recovery equipment. The Agency has required the submission of information that will enable it to insure that all approved laboratories can test equipment under Agency standards and the accepted SAE J standards. EPA has only requested information which will verify whether or not a laboratory is capable of testing equipment to these minimum national standards.

EPA may certify recycling or recovery equipment that was not tested by an independent laboratory. In order for EPA to certify equipment, the Agency must be provided with information that proves the ability of the equipment to recycle or recover refrigerant according to the SAE J standards. The GPD uses the information submitted by an equipment owner or an equipment manufacturer to determine if their equipment is substantially identical to equipment certified by an EPA approved independent laboratory.

EPA requires service establishments to record the name and address of any off site facility which is reclaiming their refrigerant. Inspectors from the Office of Enforcement and Compliance Assurance use the information maintained by service establishments to verify their compliance with the motor vehicle air conditioning recycling program.

When distributors purchase small containers of refrigerant, the seller must be provided with a written statement attesting to the fact that the small containers were purchased for resale only. The seller may keep the initial statement from a distributor and update the file with the amounts of refrigerant purchased in the form of small containers. These records are used by inspectors from the Office of Enforcement and Compliance Assurance to insure that small containers of refrigerant are not available for non-certified technicians. By requiring only minor additions to the existing invoice procedures, the Agency has insured total compliance with Section 609.

### 3. Non-duplication, Consultations, and Other Collection Criteria

#### a) Non-duplication

The specific information requested by this notice is not currently collected by any other office within EPA or any other government agency.

#### b) Consultations

In developing the regulations under the Act, EPA established an advisory council for issues relating to stratospheric ozone. The Stratospheric Ozone Protection Advisory Council (STOPAC) membership included representatives from affected industries, environmental interest groups, and academics in related fields. Within STOPAC, subcommittees were formed to look at the more detailed issues. The subcommittee on motor vehicle air conditioning met several times and discussed all aspects of the proposed regulations for Section 609 of the Act. The Federal Register Notice required under 5 CFR 1320.8(d), soliciting comments on this collection of information was published on 12/20/2001 no comments were received.

#### c) Effects of Less Frequent Collection

The equipment certification time table was established by Congress in Section 609. Since the certification submission is a one time occurrence, a less frequent collection of this information would make it impossible to comply with Section 609.

Again, both technician certification programs and independent laboratory equipment testing programs are required to be submitted to EPA under Section 609 of the Act. The review is a one time occurrence and must take place to allow the Agency to approve programs under the Act.

#### d) General Guidelines

This rule does not exceed any of the guidelines.

#### e) Confidentiality and Sensitive Questions

##### i) Confidentiality

This section does not apply because this ICR does not request information of confidential nature.

##### ii) Sensitive Questions

This section does not apply because this ICR does not request information of a sensitive nature.

#### **4. The Respondents and the Information Requested**

##### **a) Respondents / SIC Codes**

The following is a list of SIC codes affected by the manifest information requirements covered under this ICR:

5511 - New and Used Motor Vehicle Dealers  
5541 - Gasoline Service Stations  
7513 - Truck Rental and Leasing Without Drivers  
7414 - Passenger Car Rental  
7532 - Top, Body, Upholstery Repair and Paint Shops  
7538 - General Automotive Repair Shops  
7539 - Automotive Repair Shops not Elsewhere Classified

##### **b) Information Requested**

i) Data Items, including Recordkeeping Requirements: All entities that service motor vehicle air conditioners must send to EPA on a one-time basis a motor vehicle air conditioner recover/ recycle equipment certification. This certification must include the name of the establishment, address where the equipment will be used, telephone number, name of equipment manufacturer, model number, date of manufacture serial number and the signature of the owner/ operator of the equipment.

Technician certification programs interested in certifying technicians are required to send a copy of their program to EPA for approval. A successful test includes the following components: all relevant SAE standards dealing with the servicing and repair of motor vehicle air conditioners; likely future technological developments; the general regulatory requirements imposed by EPA under Section 609 of the Act; the environmental consequences of the release of refrigerant during the servicing and repair of motor vehicle air conditioners; and the adverse effects of stratospheric ozone depletion. Certification programs are required to conduct a periodic review and provide EPA with a written assurance that they have taken the necessary steps to update their tests. At a minimum, the Agency requires that this review be conducted every two years and that the Agency be provided with a program review summary report.

In addition to including copies of the proposed tests, the testing authorities must provide information concerning the authority that will grade the test, the score required to pass the exam, the means of identifying the individual taking the test, and the measures taken at the test site to ensure that the tests are completed honestly by each technician. Once the technician has successfully completed a certification test, the testing authority must provide individual

proof of certification. Potential certification programs must furnish a sample of their proof of certification for EPA.

Independent laboratory testing of recycling and recovery equipment is designed to ensure the equipment is capable of safely meeting the standards established by EPA in appendices to the regulation. To ensure a degree of uniformity to the equipment certification programs, independent laboratories are required to submit an application to EPA that includes the procedures used to test recycling equipment for its ability to remove moisture, oil, and noncondensable gas from refrigerant. For each test the laboratory must include a list of equipment used and the temperature parameters for the tests.

Equipment owners or manufacturers who request an EPA certification of their equipment as substantially identical must submit an application and supporting documents to the Agency. Among the supporting documents, there must be included process flow sheets, and a list of equipment components. The applicant is free to submit other information they feel would assist EPA in identifying the equipment as substantially identical to certified equipment.

Service establishments must record the facility name and address to which any refrigerant is sent to for off-site reclamation or recycling. If the purchaser of small containers intends to resell them, the seller must be provided with a written statement that the containers are for resale only. The statement must also contain the purchaser's name and address and must be kept for three years. In addition, any person who owns approved recycling equipment and sends used refrigerant off-site for reclamation must keep records for three years of the name and address of the facility to which the refrigerant is sent. Finally, any person who owns equipment must retain records for three years demonstrating that all technicians authorized to operate the equipment are certified pursuant to the Clean Air Act.

ii) Respondent Activities:

A. All Entities That Service Motor Vehicle Air Conditioners

- Compile a certification that states the following: name of the establishment, mailing address where equipment will be located, telephone number, name of equipment manufacturer of the installed recycling or recovery machine, equipment model number, the date of manufacture, and serial number. The owner of the equipment must sign the certification stating that the equipment will be properly used in servicing motor vehicle air conditioners and that each individual authorized by the purchaser to perform service is properly trained and certified. In many cases a form is provided by the manufacturer of the equipment. Once the form is complete, it must be sent to EPA.

B. Technician Certification Programs

- Submit a copy of the training program to EPA.

- Conduct a program review every two years and send the summary to the EPA.

C. Independent Laboratories

- Research SAE J standards on motor vehicle air conditioning recycling and recovery equipment.

- Compile test procedures to insure that the testing program fulfills the SAE J-1990 standards for recycling and recovery equipment.

- Assemble test methodology, a list of equipment required and the temperature parameters for the report to EPA.

D. Substantially Identical Equipment Owners or Manufacturers

- Locate information that will verify that the equipment can perform to the SAE J standards, including process flow sheets and a list of components.

- Compile supporting information and submit it to EPA.

E. Recordkeeping

- Record the facility address to which any refrigerant is sent for off-site reclamation or recycling.

- Compile and file written statements to verify that purchasers intend to only resell the small containers of refrigerant.

**5. The Information Collected: Agency Activities, Collection Methodology, and Information Management.**

a) Agency Activities

- Enter and store certifications from all entities that have purchased approved recycling equipment.

- Store certifications from small entities that want to claim a year exemption to purchasing approved equipment.

- Review test materials for technician certification programs.

- Review summaries of program updates every two years.



- Review applications from independent labs that certify recycling and recovery equipment.
- Review application and supporting documents from recycling or recovery equipment manufactures or owners for EPA equipment certification.
- Inspect records maintained by service establishments and establishments that sell small containers of refrigerant to distributors.

b) Collection Methodology and Management

The GPD and the EPA regional offices have planned and allocated resources for the efficient and effective management and use of this information. The Agency has developed a sample form that manufacturers may distribute to service establishments that have purchased approved recycling equipment. An establishment may submit the form provided by the manufacturer of the recycling equipment. Entities are not required to use the manufacturer's form, but they must submit the required information. The information submitted by each service establishment is maintained by the EPA regional offices.

Technician certification programs must be submitted to the Agency for review and approval by the GPD. Program materials include, but are not limited to: video tapes, scripts, manuals, booklets, and software or other forms of electronic information. Testing of technicians may be performed either manually or electronically. The certification programs and their review reports are kept on file at EPA for reference.

Independent laboratories must submit an outline of their test procedures for testing recycling and recovery equipment to the Agency. The Agency compares the procedures submitted for their ability to meet the SAE standards as specified in Section 609 of the Act. These outlines may be submitted manually or electronically, as long as they are made available for Agency review.

Equipment manufacturers or equipment owners that are interested in having their equipment determined substantially identical must submit information to the Agency for an evaluation of the equipment. The information provided is kept on file at EPA for reference.

The Agency has determined that periodic on-site inspection is the most effective method to insure compliance with section 609. The records should be kept at the location where service involving refrigerant is performed or where small containers of refrigerant are distributed for resale.

c) Small Entity Flexibility

Section 609 contains a provision which allowed small entities (i.e., those which performed service on fewer than 100 motor vehicle air conditioners during the calendar year 1990) an extra year to comply with the provisions of Section 609.

EPA expects a small number of technician certification programs and independent laboratory equipment testing programs to apply for approval. The requirement to submit the program for Agency approval is not burdensome and is not expected to prevent small entities from developing programs. The Act does not require programs to be developed, only that once developed they be submitted to EPA.

The substantially identical determination is designed to examine equipment sold before the regulations was proposed and that had not been certified by an approved independent laboratory. This provision will benefit small entities who may have purchased recycling or recover equipment in a good faith effort to recover refrigerant prior to the regulatory mandate. The information requested is available in an equipment owners manual.

The name and address of the reclamation or recycling facility to which refrigerant is sent by an establishment with recover only capabilities is a normal part of existing record-keeping procedures for business transactions. The records maintained by persons who sell small containers of refrigerant require only that the resale only statement be added into invoicing procedures.

d) Collection Schedule

All entities were required to submit certification forms to EPA by January 1, 1993. The certification for recycling and recovery equipment is intended as a one-time information request for the life of the equipment.

After the initial EPA approval, technician training programs must review their programs every two years to account for technological developments. A summary of the program review must be submitted to EPA.

The submission of information for the grandfathering of equipment is a one-time information request. The records required by EPA must be maintained for a three year period in case of a periodic inspection.

**6a. Estimating the Burden and Cost of the Collection**

The Agency estimates that there are no capital/start-up costs associated with the requirements of section 609 and therefore with the renewal of this information collection request.

i)A) Certification by Service Facilities

The burden was estimated to be a quarter hour based on the limited nature of the information requested, and the ease of obtaining the information. An hour of industry time was valued at \$50 which represents an average hourly rate of pay for a private firm. The number of respondents under the previous information collection was previously estimated at 10,000, but based on the response from service stations, we adjusted our estimate down to 2,000 service stations per year, which is more appropriate. The quarter burden hour per service station at a cost of \$12.50 per hour is the cost upon which this estimate is predicated. See the attached table for aggregate costs and burden hours.

i)B) Equipment Certification for Service Stations that will Change Ownership or New Firms Entering the Market

The burden was estimated to be a quarter hour based on the limited nature of the information requested, and the ease of obtaining the information. EPA estimated that EPA would receive an additional 4,000 certification forms from either service establishments that had changed ownership after January 1, 1993 or new service establishments that will start business after January 1, 1993. EPA estimated that 2,000 certification forms would be received per year. See the attached table for the estimated number of respondents and burden hours for each respondent.

ii) Technician Certification Programs

The burden of submitting the training program to EPA can easily be incorporated into an establishment's mailing system. The burden of summarizing the program review was estimated at two hours because of the brief nature of the document. Each hour of private industry time has been valued at \$50.00. See the attached table for the estimated number of respondents and burden hours for each respondent.

iii) Substantially Identical Equipment Submission

The burden was estimated to be one hour based on the ease of obtaining the information from a standard equipment owners manual. Routine engineering and testing information is adequate for supporting documentation from an equipment manufacturer in a substantially identical claim. An hour of industry time was valued at \$50.00 which represents an average hourly rate of pay for a private firm. See the attached table for the estimated number of respondents and burden hours for each respondent.

iv) Small Container Purchased for Resale Only Recordkeeping

The recordkeeping requirements for the purchase of small containers of refrigerant for resale only entails the minimal extension of the normal invoicing procedures. The number of distributors

was derived from a discussion with a representative from the Automotive Refrigeration Products Institute. Whenever the purchase of refrigerant is made for resale only, the seller must be provided with a written statement that the refrigerant purchased is for resale only. This statement must be kept on file and updated with additional purchases of refrigerant. It was estimated that purchasers of refrigerant who intend to resell it will buy the small containers in bulk, making recordkeeping a very minimal task for the sellers. It was estimated that distributors would buy in bulk twice a year (.25 hrs per occurrence). An hour of industry time was valued at \$50 per hour, which represents an average hourly rate of pay a private firm. See the attached table for the estimated number of respondents and burden hours for each respondent.

v) Recordkeeping for Off-site Reclamation or Recycling

The time burden was estimated at five minutes based on the limited nature of the information requested and the ease of obtaining the information. Recover/recycle equipment manufacturers have estimated that already 150,000 pieces of recycling equipment have been sold and therefore the refrigerant is assumed to be recycled on-site. The removal of 35,000 service establishments from the total number of establishments and concluded that the estimated number of establishments expected to use off-site facilities is 5,000. This number was based on our view of the continued trend at service establishments to recycle on-site therefore reducing the burden in this category. An hour of industry time was valued at \$50.00 which represents an average hourly rate for a private firm. See the attached table for the estimated number of respondents and burden hours for each respondent.

vi) All Equipment Operators are Certified Technicians Recordkeeping

The time burden was estimated at five minutes based on the limited nature of the information requested and the ease of obtaining the information. An hour of industry time was valued at \$50.00 per which represents an average hourly rate for a private firm. See the attached table for the estimated number of respondents and burden hours for each respondent.

**6b. Estimating Agency Burden and Cost**

The hours for data entry of the equipment certifications were calculated at an entry rate of 30 certification cards per hour. It is expected that no more independent laboratories will apply for EPA approval. The two-year review of training programs will be undertaken by one EPA analyst and take two hours per program. The applications for the equipment to be certified by EPA as substantially identical will be reviewed by EPA and take approximate five hours per application. All labor rates were calculated at a \$40 per hour figure, an average rate for EPA personnel. This includes an increase of \$5.00 an hour for cost of living increases.

**6c. Bottom Line Burden Hours and Cost Tables**

i) Respondent Tally

Annual Burden Hours: 6882

Annual Costs: \$129,631

ii) Agency Tally

Annual Burden Hours: 325

Annual costs: \$13,000

f) Reasons for Change in Burden

The decrease in burden results from the fact that the number of service facilities entering the market and changing ownership was overstated in previous ICRs, and is being adjusted downward. The estimate for equipment certification of service stations that newly enter the market or that change ownership is now 1,000. The estimated number of certifications from facilities purchasing MVAC recovery equipment is 2,000. EPA does not anticipate that any organizations will apply to EPA in the future to become EPA-approved technician certification programs, and EPA does not anticipate that any organizations will apply to EPA in the future to become approved independent standards testing organizations. The annual hours and costs related to initial submissions by these organizations have therefore been eliminated.

This revision to the burden also reflects a significant reduction in the number of off-site reclamation or recycling respondents to 5,000.

g) Burden Statement

The industry reporting burden for this collection is estimated in the following tables. It includes the time needed to comply with EPA's certification requirements and Agency reviews.

Equipment Certification Burden per Occurrence

Respondent Activities	Service Entity hrs.
Complete certification and submit it to EPA	.25

Technician Certification Program

Respondent Activities	Training Program Companies hrs.
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2 year review of training

program, with a summary  
being submit to EPA

2

Substantially Identical Equipment

Response Activities

Applicant hrs.

Compile information  
on equipment and  
submit to EPA

1

Small Containers Purchased for Resale Only  
Recordkeeping Requirements

Response Activities

Sellers of Small Containers hrs.

Compile and file  
information

.5

Recordkeeping for Off Site Reclamation or Recycling

Response Activities

Service Establishment hrs.

Recording the name and  
address of the off site  
facility

.08

All Equipment Operators are Certified Technicians

Response activities

Service Establishment hrs.

Filing certification cards

.08

TOTAL

3.81 hours

For the total reporting burden, total recordkeeping burden, and grand total public burden, see the information located behind the attached chart.

Source data and informational requirements for stratospheric ozone protection:

Equipment Certification Burden -- Complete certification and submit it to EPA: CAA Section 609(d) and 40 CFR 82.42(a).

Technician Certification Program -- 2 year review of training program: 40 CFR 82.40(c).

Substantially Identical Equipment -- Compile information on equipment and submit to EPA: 40 CFR 82.36(b).

Small Containers Purchased for Resale Only Recordkeeping Requirements -- Compile and file information: 40 CFR 82.42(b)(3).

Recordkeeping for Off Site Reclamation or Recycling -- Recording the name and address of the off site facility: 40 CFR 82.42(b)(1).

All Equipment Operators are Certified Technicians Recordkeeping -- Filing the certificates in service facility files: 40 CFR 82.42(b)(2).

Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions, develop, acquire, install, and utilize technology and systems for the purpose of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations are listed in 40 CFR Part 9 and 48 CFR Chapter 15.

Send comments regarding burden estimates or any other aspect of this collection of information, including suggestions for reducing the burden, to Director, OEI, Collections Strategies Division, MC 2822T, U.S. Environmental Protection Agency, 1200 Pennsylvania Avenue N.W., Washington, D.C. 20460, and to Paperwork Reduction Project, EPA Desk Officer, Office of Information and Regulatory Affairs, Room 10202, Office of Management and Budget, Washington, D.C. 20503. Reference EPA Number 1617.04 and OMB Number 2060-0247 in all correspondence.

ACTIVITY	CAPITAL/ START UP BURDEN HOURS	CAPITAL/START UP COSTS	ANNUAL BURDEN HOURS	ANNUAL COSTS
REPORTING				
Certification by Service Facilities	0	0	.25	\$12.50
x # respondents (2,000)	0	0	500 hrs.	\$6,250
Equipment Certification for Service Stations that will Change Ownership or New Firms Entering the Market	0	0	.25	\$12.50
x #respondents (1,000)	0	0	250 hrs.	\$781
Substantially Identical Equipment Submission	0	0	1	\$50
x # respondents (12)	0	0	12 hrs.	\$600
RECORDKEEPING				
Small Container Purchased for Resale Only Recordkeeping	0	0	.5	\$25
x # respondents (2000)	0	0	1,000 hrs.	\$50,000
Recordkeeping for off site Reclamation or Recycling	0	0	.08	\$4
x # respondents (5,000)	0	0	4,000 hrs.	\$16000
All Equipment Operators are Certified Technicians Recordkeeping	0	0	.08	\$4
x # respondents (14,000)	0	0	1,120 hrs.	\$56,000
TOTALS	0 hrs.	\$0	6,882 hrs.	\$129,631

NUMBER OF RESPONDENTS

EXISTING SERVICE FACILITIES ENTERING MARKET	2,000
NEW FACILITIES ENTERING MARKET	1,000
FACILITIES THAT SEND REFRIGERANT OFF-SITE	5,000
SUBMITTERS OF SUBSTANTIALLY IDENTICAL EQUIPMENT	12
WHOLESALERS KEEPING RECORDS OF	
SALES OF SMALL CONTAINERS FOR RESALE	2,000
RECORDKEEPING BY CERTIFIED TECHNICIANS	14,000
<b>TOTAL</b>	<b>24,012</b>



**RECORDKEEPING:**

TOTAL RECORDKEEPING CAPITAL/START UP BURDEN HOURS: 0

TOTAL RECORDKEEPING ANNUAL BURDEN HOURS: 762 HOURS

TOTAL RECORDKEEPING CAPITAL/START UP COSTS: 0

TOTAL RECORDKEEPING ANNUAL COSTS: \$7,631

**REPORTING:**

TOTAL REPORTING CAPITAL/START UP BURDEN HOURS: 0 HOURS

TOTAL REPORTING ANNUAL BURDEN HOURS: 6120 HOURS

TOTAL REPORTING CAPITAL/START UP COSTS: \$0

TOTAL REPORTING ANNUAL COSTS: \$122,000

**TOTAL PUBLIC BURDEN:**

SUM OF TOTAL CAPITAL/START UP BURDEN HOURS AND TOTAL ANNUAL BURDEN HOURS: 6882 HRS.

SUM OF TOTAL CAPITAL/START UP COSTS AND TOTAL ANNUAL COSTS: \$129,631